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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL

Petitioners,

v.

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715

Respondent.

Case No: C-07-5158-MMC

DECLARATION OF LAURENCE R.
ARNOLD IN SUPPORT OF
MOTION FOR RELIEF FROM
CASE MANAGEMENT SCHEDULE

Judge: Hon. Maxine M. Chesney

1. I am an attorney at law, licensed to practice in the State of California and before this Court. I am a partner with the law firm of Foley & Lardner LLP, counsel of record for Petitioners Stanford Hospital & Clinics and Lucille Packard Children's Hospital (the "Hospitals") in the above-captioned case. I have personal knowledge of the matters stated herein and, if called to do so, could and would testify of my own personal knowledge to the facts set forth below.

2. I am lead trial counsel for the Hospitals in the above-captioned case.

3. Between January 17, 2008 and February 8, 2008, I will be traveling abroad. My

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1 travel arrangements have been in place for approximately half a year, and I have already
2 committed to flight, hotel, and other travel arrangements.

3
4 4. On the week beginning February 18, 2008, I am scheduled to appear for jury duty
5 in the United States District Court for the Northern District of California.

6 5. On December 26, 2007, I conferred by telephone with Vincent A. Harrington Jr.,
7 lead trial counsel for Respondent Service Employees International Union, Local 715 (the
8 "Union"). During that conference, Mr. Harrington and I discussed the filing of a Stipulated
9 Motion For Relief From Case Management Schedule, which had been previously provided for
10 Mr. Harrington's review. Mr. Harrington stated that he had no objection to the proposed
11 stipulated motion. Mr. Harrington and I also agreed that it is likely that this case will be resolved
12 through the filing of a dispositive motion, and that, for that reason, it is unlikely that formal
13 discovery and a trial will be necessary in this case. We agreed that, in light of these facts, it
14 would be economical to postpone the holding of an Initial Case Management Conference for an
15 extended period, which would allow the Court to hear and decide a dispositive motion, and
16 which could or would eliminate the need for the Court to hold the Initial Case Management
17 Conference and issue a Case Management Order.

18
19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct.

21 Dated: December 28, 2007

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23 
24 LAURENCE R. ARNOLD